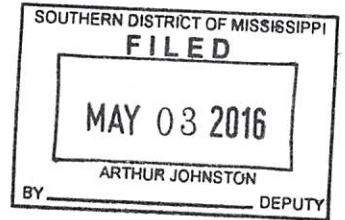


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:16-cr-346-RHW

RANDY MITCHELL WILSON

18 U.S.C. § 1001

The United States Attorney charges:

That on or about March 4, 2014, in Jackson County in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **RANDY MITCHELL WILSON**, aided and abetted by others known and unknown to the United States Attorney, did knowingly and willfully make and cause to be made a false and fraudulent material statement and representation in a matter within the jurisdiction of the United States Navy, and a matter within the jurisdiction of the United States Coast Guard, both agencies of the United States of America, in that the defendant made a false and fraudulent material statement and representation to special agents of the United States Navy and United States Coast Guard, at a Huntington Ingalls Industries office in Pascagoula, Mississippi, in which he represented that he had no knowledge of an employee receiving unauthorized premium dive pay when not actively diving, when in truth and in fact, the statements and representations were false because, as **RANDY MITCHELL WILSON** then and there knew, he had approved one or more employees to receive premium dive pay without actually diving.

In violation of Sections 1001 and 2, Title 18, United States Code.


GREGORY K. DAVIS
United States Attorney